

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

UNITED STATES OF AMERICA :  
 :  
v. : Criminal Action No.  
 : 3:21-CR-0004-TCB-RGV  
ROBERT PURBECK :

**UNOPPOSED MOTION FOR EXTENSION OF THE TIME TO FILE PRETRIAL  
MOTIONS AND TO SCHEDULE PRETRIAL CONFERENCE**

Defendant Robert Purbeck hereby respectfully requests an extension of time in which to file any pretrial motions until August 9, 2021 and for the Court to hold the initial pretrial conference thereafter. This represents just over a 60-day extension of time from the current deadline of June 7, 2021, and it was arrived at in consultation with the government and to account for personal leaves for both counsel for Mr. Purbeck and counsel for the government.

Mr. Purbeck further requests and consents to the Court excluding the period of any extension that is granted from the Speedy Trial Act. The government does not oppose this requested extension.

In further support of this motion, Mr. Purbeck respectfully submits as follows.

1. Mr. Purbeck was arraigned in the Northern District of Georgia on March 22, 2021. Discovery is voluminous. The government produced discovery on a 1TB external hard drive, which Mr. Purbeck provided to the government. There are additional items of discovery that Mr. Purbeck is anticipating receiving from the government.

2. Mr. Purbeck lives in Idaho. Since receiving discovery from the government on or about April 2, 2021, counsel and Mr. Purbeck have been reviewing the discovery. There is a lot of discovery to review; it is a time-consuming process; and counsel and Mr. Purbeck need additional time to complete their review so that they can determine what motions and/or defenses may exist in this case, as well as determining how best to proceed in this case. There is a protective order in this case, which prevents counsel from giving certain portions of the discovery to Defendant. While counsel has provided Mr. Purbeck copies of the discovery that he is allowed to share, the portions that must be reviewed together require counsel to schedule sessions during which he and Mr. Purbeck can review discovery simultaneously using a screen-sharing medium.

3. Given the volume of discovery that requires review, Mr. Purbeck is requesting through August 9, 2021 to file any pretrial motions and for the Court to hold a pretrial conference thereafter. This August 9<sup>th</sup> date also accounts for counsel for both parties' personal leaves in June and July. Mr. Purbeck's counsel's leave of absence will take him out of the District from June 18, 2021 through July 5, 2021 and away from his practice. Counsel for the government has also advised that he will be on personal leave from approximately July 18, 2021 through July 30, 2021.

4. The government is agreeable with, and has no opposition to, this requested extension of time.

5. Mr. Purbeck hereby consents to the exclusion under the Speedy Trial Act of the time that the Court grants for the requested extension. He further respectfully submits that such additional time is necessary for the effective preparation of his defense in this case.

WHEREFORE, for the reasons stated above, Defendant Robert Purbeck requests that the Court grant this motion and the requested extension of time.

Respectfully submitted, this 26<sup>th</sup> day of May, 2021.

/s/ Andrew C. Hall

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*Counsel for Defendant Robert Purbeck*

CERTIFICATE OF COMPLIANCE WITH TYPE AND FONT  
AND CERTIFICATE OF SERVICE

I hereby certify that this motion has been prepared in Courier New font (12 pt.) and consistent with the Local Rules of this Court.

I further hereby certify that I have this date caused a true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF THE TIME TO FILE PRETRIAL MOTIONS AND TO SCHEDULE PRETRIAL CONFERENCE to be served by filing it with the Clerk of Court using the ECF System that will send notification of such filing to:

Assistant United States Attorney Michael Herskowitz and Nathan Kitchens

This the 26<sup>th</sup> day of May, 2021.

/s/ Andrew C. Hall  
Andrew C. Hall